

Ms. Francine Torres, Administrator
USDA-AMS-TMP-NOP
1400 Independence Avenue, SW., Room 4008-So, AG Stop 0268
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Dear Madam,

I support recently proposed pasture requirements recommended by the National Organic Standards Board Livestock Committee. I feel they are particularly important for dairies based on personal experience.

I am a freelance writer who often writes about farmers. I have met and interviewed numerous dairy farmers, and am familiar with both conventional confinement operations and grass-based dairies. I also have experience milking farmstead cows. My experience has clearly shown to me that pasture-based dairies are clearly superior.

From the consumer's standpoint, the milk is better, with better fats, minerals, and vitamins. Many studies support this.

From the farmer's standpoint, production is simpler, as well as more efficient and profitable. After transition, farmers see reduced veterinary bills, have fewer headaches disposing of manure (a salient clean-water issue), and don't have to spend as much time harvesting forage. Sometimes they become seasonal, or at least reduce the number of cows worked in the winter. Animals live longer, returning more on the money invested in them.

And of ^{cows} pastures are where cows are meant to be. A ruminant's digestive system is just not designed for a diet high in grains. Yes they like to eat it, but human's like to eat candy – but that doesn't mean that a diet designed around candy is healthful. Likewise with grain for cows – see the acidosis problem, and the corollary issue of antibiotics, which is a concern for many consumers.

There are many reasons to support pasture-based dairies. I could go on, but prefer simply to state that I as an informed constituent hope you and the USDA make the National Organic Standards as pasture-focussed as possible. New Zealand has had great success with pasture dairies, and Ireland as well. Ideally someday rules will be promulgated which will provide for cost assistance for dairies transitioning away from confinement.

To conclude, let me reiterate that I would like to see the Livestock Committee's recommendation be incorporated into the standards as mandated production practices.

With kindest regards,

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